

EXHIBIT “A”**RICO STATEMENT****QUESTION #2**

| DEFENDANT | MISCONDUCT | BASIS OF LIABILITY |
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| Sulaiman Bin Abdul Aziz Al Rajhi | <p>Sulaiman Bin Abdul Aziz al Rajhi is a Saudi national who has long provided material support and resources to al Qaeda. Al Rajhi is Chairman, Managing Director, and the largest shareholder of al Rajhi Banking and Investment Corporation, and the primary financier of the SAAR Foundation and many of the organizations which operated within the SAAR Network of charities and businesses, including but not limited to African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Mena Corporation, Reston Investments, Safa Trust, Sana-Bell, Inc., Sterling Charitable Gift Fund, Sterling Management Group, Inc., and York Foundation. These charities, largely based in Herndon, Virginia, have been used to funnel moneys direct to al Qaeda and the Enterprise. Specifically, the SAAR Network Entities funneled billions of dollars of financial sponsorship as well as logistical assistance to al Qaeda through a web of interrelated entities, activities and transactions of deliberate complexity, overseen by the leaders of the SAAR Network.</p> <p>In addition, Sulaiman al Rajhi funneled money through Youssef Nada, a noted terrorist financier, through the banks he controlled in the Bahamas and for which al Rajhi had worked under Nada, as well as Bank al-Taqwa.</p> <p>Persons associated with the SAAR Foundation and its network are also implicated in for the United States Embassy bombings in Kenya and Tanzania.</p> <p>Sulaiman al Rajhi also serves on the board of directors of the IIRO, a purported “charitable” organization which has long acted as fully integrated components of al Qaeda's logistical and financial support infrastructure, and provided material support and resources to al Qaeda and affiliated foreign terrorist organizations.</p> <p>Through his control of al Rajhi Bank, Sulaiman Bin Abdul Aziz al Rajhi actively participated in that financial</p> | 1962(a) 1962(c) 1962(d) |

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| | <p>institution's support and sponsorship of al Qaeda. For example, with Sulaiman Bin Abdul Aziz al Rajhi's support and authorization, al Rajhi Bank maintained accounts for many of al Qaeda's charity fronts, including the International Islamic Relief Organization (the "IIRO"), the Muslim World League (the "MWL"), the World Association of Muslim Youth ("WAMY"), Benevolent International Foundation ("BIF") and Al Haramain Islamic Foundation ("Al Haramain").</p> <p>Al Rajhi Bank advertised the existence and numerical designation of the accounts it maintained for those charities throughout the Muslim world, and provided mechanism to allow al Qaeda's supporters to deposit funds directly into those accounts. At all times material hereto, Sulaiman Bin Abdul Aziz al Rajhi was expressly aware that many of the charities for which al Rajhi Bank provided financial services were conduits for financing al Qaeda, and that the Bank was being used as a vehicle for laundering funds on behalf of, and transferring funds to, that terrorist organization.</p> <p>Indeed, as mentioned previously Sulaiman Bin Abdul Aziz al Rajhi has served as an officer of the IIRO. Significantly, numerous branches of the IIRO were publicly implicated in al Qaeda plots throughout the 1990s, during the time that Sulaiman Bin Abdul Aziz al Rajhi was serving as an officer of the IIRO, and at which time al Rajhi Bank maintained accounts for that ostensible charity. Branch offices of al Haramain Islamic Foundation were similarly implicated in al Qaeda plots throughout the 1990s.</p> <p>Sulaiman al Rajhi is identified on the Golden Chain as one of al Qaeda's principal financiers. The "Golden Chain" document was discovered during a raid of the Bosnian offices of the Benevolence International Foundation, conducted jointly by the Federal Bureau of Investigation and Bosnian Police. During the course of that raid, the authorities seized several computer hard drives, one of which included a file named "Tareekh Osama" ("Osama's History"), containing scanned images of documents chronicling the formation of al Qaeda. The "Golden Chain" document was among several hundred documents contained in this computer file. Based on their analysis of all the documents within that file, and</p> | |
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| | <p>intelligence gathered from other sources during the war on terror, officials of the US government concluded that the document is “a list of people referred to within al Qaeda” as wealthy donors to the movement. See Government’s Evidentiary Proffer supporting the Admissibility of Co-Conspirator Statements, <u>United States of America v. Enaam Arnaout</u>, No. 02-CR-892 (N.D. Ill. filed Jan.6, 2003). The National Commission On Terrorist Attacks Upon the United States embraced this interpretation of the document in its Final Report. See Final Report of the 9/11 Commission, Note 21 to Chapter 2. The Treasury Department has similarly concluded that the "Golden Chain" is an authentic list of al Qaeda's principal individual financiers, and in fact used Adel Batterjee's inclusion in the document as a basis to for designating him as a terrorist sponsors under Executive Order 13224. See December 21, 2004 Treasury Department Press Release Regarding the Designation of Adel Batterjee, available at http://www.treas.gov/press/releases/js2164.htm</p> <p>Through his business enterprises and involvement in charities operating within al Qaeda's infrastructure, Sulaiman Bin Abdul Aziz al Rajhi has long provided material support and resources to al Qaeda. Al Rajhi has close ties to the Saudi Royal Family. Several members of the Saudi Royal Family are employed by or serve as officers of businesses owned or controlled by al Rajhi. For example, Prince Mohammad bin Nayef bin Abdel Aziz al Saud, the Assistant Deputy Minister of the Interior of Saudi Arabia, serves as the Chairman of Al Rajhi Commercial Foreign Exchange. Abdallah bin Yahya al Muallimi, the Secretary General of the Jeddah Province, serves as board member in the same company. Prince Faisal Ibn Muhamad Ibn Saud is the Chairman of al Rajhi Yamama Cement Company. Prince Turki Ibn Muhamad Ibn Abdul Aziz Ibn Turki is a board member of al Rajhi Yamama Cement Company.</p> <p>Sulaiman al Rajhi also managed the National Commercial Bank budget of defendant Saudi Joint Relief Committee (SJRC). In addition, for decades, Rajhi has been involved with the Muslim Brotherhood, a 74-year-old group which is under investigation by European and Middle Eastern governments for its alleged support of radical Islamic and terrorist groups. For decades the</p> | |
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| | <p>Brotherhood has been a wellspring of radical Islamic activity; Hamas, the militant Palestinian group, is an offshoot of it. It is also tied to leading neo-Nazis, including the Swiss Holocaust denier Ahmed Huber.</p> <p>In all these capacities, including his capacity as an officer and/or director of many of the SAAR Network Entities, Sulaiman Bin Abdul Aziz al Rajhi has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise's common goals and ultimate plan of launching an attack on America.</p> | |
| Saleh Abdul Aziz Al Rajhi | <p>Saleh Abdulaziz Al-Rajhi, eldest brother of Sulaiman, has been Chairman of Al Rajhi Banking and Investment Corporation, and is inextricably tied to the actions of Al Rajhi Banking and Investment Corporation as alleged above and in previous court filings. Furthermore, Saleh Abdulaziz al-Rajhi is personally linked to Wadi el-Hage, Osama bin Laden's personal secretary. (Saleh's phone number found in Wadi's phone book upon his arrest.). Wadi el-Hage was convicted for his role in the 1998 Embassy Bombing in Kenya and Tanzania.</p> | <p>1962(a) 1962(c) 1962(d)</p> |
| Abdullah Sulaiman Al-Rajhi | <p>Abdullah Sulaiman Al-Rajhi is General Manager of the Al-Rajhi Banking & Investment Corp., and member of its executive committee, and is inextricably tied to the actions of Al Rajhi Banking and Investment Corporation as alleged above and in previous court filings. In addition, he was President of Aradi, Inc., located at the same address as SAAR, 555 Grove Street in Herndon, Virginia. Through Abdullah Sulaiman Al-Rajhi, the Safa Group had access to a bank and banking officials for purposes of producing checks purportedly paid for SAAR's charitable purposes but which actually went towards the benefit of the Enterprise.</p> | <p>1962(a) 1962(c) 1962(d)</p> |